

## Project Management Plan for Label Improvement (Plan)

The Project Management Plan for Label Improvement (Plan) was developed by the Core Project Management Team (Core Team). The Core Team is comprised of representatives of state lead agencies for pesticide regulation including the Office of the Indiana State Chemist, the Florida Department of Agriculture and Consumer Services, the New Mexico Department of Agriculture and the California Department of Pesticide Regulation, and the US Environmental Protection Agency's Offices of Pesticide Programs and Enforcement and Compliance Assurance.

**Goal:** *Development of the ideal "good" label based on standardization, consistency, accuracy, understandability, and achieving compliance.*

**Scope:** *All products that require registration under FIFRA.*

The Core Team identified the following areas for label improvement:

1. Formatting;
2. Enforceability;
3. Directions for Use; and
4. Claims.

In addition, the Core Team considered the Future of Labels. A discussion of the Future of Labels is included in the Plan, and, is separate from the areas for label improvement. In this section, the outcomes of the Plan which serve as the building blocks for label improvement will be incorporated into training, technological improvements and Standard Operating Procedures.

For each area for label improvement, the Core Team determined the scope, composition of the Plan Implementation Team, resources, deliverables and specific barriers. Given the uniqueness of each area for improvement, the Plan Implementation Teams will determine the timeline for completion. Resources and barriers common to all areas for improvement are identified.

To assist, for the purposes of this Plan, the following terms are used:

- Core Project Management Team (Core Team) - Team responsible for the development of the *Project Management Plan for Label Improvement* including goal, objectives and deliverables for Plan Implementation Teams; comprised of state lead agency and EPA representatives with responsibility for pesticide regulation.
  - Core Team Lead – For each area for label improvement, Core Team member serving as lead when addressing common concerns within an Area for Improvement.
- Area for Label Improvement – Identified by the Core Team, the specific attributes of pesticide labels that can be improved.
- Plan Implementation Team – Team comprised of subject matter experts; assigned to a specific area for label improvement;

- Improvement Team – Subgroup of Implementation Team that considers specific issues identified within area for label improvement and completes deliverables. For example, Formatting Improvement Team.
- Improvement Team Lead— For each area for label improvement, Team member serving as lead for fulfillment of Plan to address common concerns.
- Deliverables - For each area for label improvement, the specific product(s) that will be developed by the Plan Implementation Team.

## Resources - Areas for Label Improvement

For each of the Areas for Label Improvement, the following have been identified as possible resources:

[ HYPERLINK "<https://www.ecfr.gov/cgi-bin/text-idx?SID=87fa40f70b8af378966145c03427dce3&mc=true&node=pt40.26.152&rgn=div5>" ]

Pesticide Registration And Classification Procedures

[ HYPERLINK "<https://www.ecfr.gov/cgi-bin/text-idx?SID=a66493222ba05a6914d6e5bfb47f8676&mc=true&node=pt40.26.156&rgn=div5>" ] –

Labeling Requirements for Pesticides and Devices

[ HYPERLINK "<https://www.epa.gov/pesticide-registration/pesticide-registration-manual>" ]

[ HYPERLINK "<https://www.epa.gov/pesticide-registration/label-review-manual>" ]

State Label Issues Tracking System (SLITS)

Office of Pesticide Programs Electronic Labeling ([ HYPERLINK

"<https://www.epa.gov/pesticide-registration/office-pesticide-program-electronic-label-oppel-pilot>" ] )

Additional resources for an area for label improvement may be provided in those specific Plan sections.

In fulfilling the Plan, common barriers which may impact full implementation include:

- Requirement for changes in federal law to accommodate needed improvement;
- Ongoing support and commitment to complete project;
- Team members transition from planning to implementation;
- Willingness to implement necessary changes;
- Stakeholder acceptance;
- Asynchronous implementation of improvements; and

- Unintended consequences of improvements.

Additional barriers specific to an area for label improvement may be provided in those specific Plan sections.

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